

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MILDRED ANNE DUDLEY,

Plaintiff,

v.

MORGAN KEEGAN & COMPANY,
INC.

Defendant.

CIVIL NO. 1:11-cv-02700-RLV

**PLAINTIFF'S MOTION
FOR HER REASONABLE ATTORNEY'S FEES AND EXPENSES**

Pursuant to 29 U.S.C. 216(b), the terms of Defendant's offer of judgment and Plaintiff's acceptance of that offer [*see* Docs. 76 and 79], the entry of judgment against Defendant on January 4, 2013 [Doc. 91], and Rule 54, Plaintiff respectfully moves this Court for an award of her reasonable attorney's fees and litigation expenses. Plaintiff states that, as of the date of filing this motion, she estimates that she has incurred reasonable attorney's fees, necessarily incurred in the prosecution of this action, of approximately \$162,500.00 (plus expenses of \$4,277.82). Pursuant to Local Rule 54.2, Plaintiff will file her brief in support of her motion for fees within 30 days of filing her motion and will file her bill of costs within 30 days of the entry of judgment against Defendant.

Dated: January 17, 2012

Respectfully submitted,

Counsel for Plaintiff:

s/G. Blake Andrews

Gary Blaylock "Blake" Andrews, Jr.
Georgia Bar No. 019375

Blake@AndrewsStembridge.com

John T. Stembridge

Georgia Bar No. 678605

John@AndrewsStembridge.com

Andrews & Stembridge, LLC

1904 Monroe Drive, Suite 130

Atlanta, GA 30324

Telephone: 770-828-6225

Facsimile: 866-828-6882

s/S. Renee Huskey

S. Renee Huskey

Georgia Bar No. 380145

Ichter Thomas, LLC

3340 Peachtree Road, NE, Suite 1530

Atlanta, Georgia 30326-1084

Tel: 404-869-7600

Fax: 404-869-7610

Direct: 404-869-5242

email: rhuskey@ichterthomas.com